

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MAHMOUD KHALIL, et al.,

Plaintiffs,

v.

TRUSTEES OF COLUMBIA UNIVERSITY
IN THE CITY OF NEW YORK, et al.,

Defendants.

No. 1:25 Civ. 02079 (AS)

**RESPONSE OF DEFENDANTS TRUSTEES OF COLUMBIA UNIVERSITY IN THE
CITY OF NEW YORK AND KATRINA ARMSTRONG TO PLAINTIFFS' MOTION
FOR LEAVE TO PROCEED USING PSEUDONYMS AND TO FILE UNDER SEAL
CERTAIN EXHIBITS WITH PERSONALLY IDENTIFYING INFORMATION**

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On March 13, 2025, Plaintiffs Mahmoud Khalil, Jane Joe, Sally Roe, Ned Noe, Lucy Loe, Sam Soe, Will Moe, and Kam Koe commenced this action. ECF 1. That same day, Plaintiffs Joe, Roe, Noe, Loe, Soe, Moe, and Koe moved for leave to proceed using pseudonyms, and Plaintiffs requested leave to file certain exhibits with personally identifying information under seal. ECF 5. On March 18, 2025, the Court temporarily granted the motion to proceed under pseudonym and permitted the relevant exhibits to be filed “under provisional seal” and “provisionally designated attorneys’ eyes only.” ECF 12. The Court also directed Defendants to file any opposition to Plaintiffs’ motion within two weeks of their entry of a notice of appearance. *Id.* Plaintiffs filed their sealed exhibits *ex parte* on March 16, 2025. ECF 16.

Counsel for Defendants Trustees of Columbia University in the City of New York and Katrina Armstrong (together, “Columbia”) entered appearances on March 24, 2025. ECF 33-35. On March 25, 2025, the Court conducted a hearing on Plaintiffs’ motion for a temporary restraining order and preliminary injunction and directed Plaintiffs to provide their *ex parte* filings to Defendants’ “counsel in this case.” ECF 52 at 90. On March 26, 2025, Plaintiffs provided these filings to defense counsel who had entered appearances.

Columbia does not oppose Joe, Roe, Noe, Loe, Soe, Moe, and Koe’s request to proceed under pseudonym, or Plaintiffs’ request to file documents containing Plaintiffs’ identifying information under seal, subject to the parties reaching an agreement on the scope of access to sealed filings containing Plaintiffs’ identifying information that will enable Columbia to litigate the case effectively. The parties are currently engaged in discussions concerning a protective order that would provide for additional attorneys and support staff to have access to such sealed filings, as well as to any future filings placed under seal for similar reasons. If the parties are unable to reach an agreement, Columbia reserves the right to submit an application to the Court that would

permit additional attorneys and support staff access to Plaintiffs' identifying information for purposes of this litigation, subject to a protective order.

Dated: New York, New York
April 7, 2025

Respectfully submitted,



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